State Attorneys General from all 50 states have called upon USTelecom – The Broadband Association to take further actions to trace back and combat illegal robocalls using the Industry Traceback Group (“ITG”) formed under the auspices of the Association.

In a letter dated May 4, the state officials follow up on late January 2020 discussions concerning “ITG’s continued collaboration with the state attorneys general and ways to both augment and streamline the information sharing process in order to better facilitate enforcement actions by state attorneys general."

The officials note that “[g]iven the exponential growth of illegal robocalls targeting the American public, the state attorneys general plan to continue intensifying our enforcement efforts against illegal robocallers and other related bad actors. As a result, we expect a growing need for data analyses and pattern recognition to better understand changing trends and the overall problem both in individual states and nationwide. Additionally, we contemplate increases in our issuances of subpoenas or civil investigative demands directly to the ITG for tracebacks.”

To that end, the group asks the ITG to focus on the following priorities:

1. Utilizing a wider variety of call data sources to both diversify and aggregate as much pertinent robocall data as possible;
2. Analyzing such data to identify past, current, and future illegal robocall campaigns and trends and to better understand the interconnected ecosystem of businesses facilitating illegal robocallers;

3. Automating traceback investigations and increasing the total volume of such investigations;

4. Alerting relevant law enforcement agencies, including state attorneys general, of suspected illegal robocall campaigns with sufficient information to trigger investigations;

5. Enabling law enforcement agencies to upload and receive responses to subpoenas and civil investigative demands electronically;

6. Providing swift and comprehensive compliance with such subpoenas and civil investigative demands electronically; and

7. Identifying non-cooperative voice service providers (VSPs), such as (a) VSPs that do not participate in the traceback process, (b) VSPs that repeatedly originate or accept illegal robocalls, (c) VSPs that are regularly the domestic point of entry for illegal robocalls originating outside the U.S., and (d) VSPs that are repeatedly incapable of providing sufficient records.

The Attorneys General believe that “implementation of these priorities, in conjunction with steps taken by the state attorneys general and our federal counterparts, will further our collective goal of combating unwanted and illegal robocalls.”

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